

**CHAKEJIAN v. EQUIFAX INFORMATION SERVICES, LLC, No. 07-2211**

Time expended for:  
**JOHN SOUMILAS**

951.70 @ \$410.00/hr.  
\$390,197.00 total

*Francis and Mailman*  
**John Soumilas's Time Entry Report**  
**for Selected File:**

**Chakejian, R. v. Equifax, et al., No. 07-2211**

Client ID: Ch005  
Matter ID: Ch005-001

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Fri. Sep 28, 2007		Review file; research re: class claim; discussions with JAF.	1.80
Fri. Nov 30, 2007		Review answer; outline problematic affirmative defenses; think strategy.	1.70
Wed. Dec 5, 2007		Review motion to extend time to file motion for class cert.; review e-mail from Equifax re: other cases.	0.60
Tue. Dec 11, 2007		Review order re: status conference.	0.20
Mon. Dec 17, 2007		Review amended answer; correspondence with paralegal; discussion re: disclosures and discovery.	0.50
Mon. Dec 24, 2007		Review court order re: class cert. schedule; review status of disclosures and discovery.	0.40
Wed. Jan 2, 2008		Review e-mail correspondence; think about demand requested by Equifax.	0.50
Fri. Jan 25, 2008		Review Judge's procedures; meeting with paralegal; strategy meeting with JAF; review forms and reports that are due prior to conference; review and revise 26(f); prepare internal e-mail re: various strategy matters in the case.	2.80
Wed. Jan 30, 2008		Prepare for and attend status conference; legal research re: key merits and class issues in the case; research re: other class actions against Equifax; review Abusaab trial transcript; prepare internal strategy memo.	9.30
Thu. Jan 31, 2008		Begin working on written discovery requests (interrogatories and document request); internal memo re: several discovery and strategy matters.	2.40
Fri. Feb 1, 2008		Legal research re: FCRA certified cases and other similar consumer cases (non-FCRA); continue to prepare internal strategy memo; meetings with JAF and JYP.	5.30
Thu. Feb 7, 2008		Begin to prepare class certification interrogatories and document requests.	0.90

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Fri. Feb 8, 2008		Continue to prepare class certification interrogatories and document requests.	2.80
Tue. Feb 19, 2008		Continue to work on drafting merits and class written discovery; select legal research in connection with same.	3.90
Wed. Feb 27, 2008		Continue to prepare written discovery to both merits and class issues; prepare deposition notices; prepare detailed letter re: electronic discovery.	4.40
Thu. Feb 28, 2008		Continue to prepare written discovery to both merits and class issues; prepare deposition notices; prepare detailed letter re: electronic discovery.	3.50
Wed. Mar 5, 2008		Continue to prepare and revise, interrogatories, document requests, depositions, and letter re: electronic discovery; several meetings with paralegal and JAF.	5.50
Thu. Mar 6, 2008		Review court scheduling order.	0.20
Fri. Mar 7, 2008		Review correspondence and ECF notices.	0.40
Mon. Mar 10, 2008		Review e-mail correspondence from L.Peling; from JAF; review dep. notices.	0.30
Tue. Mar 11, 2008		E-mail correspondence from L.Perling.	0.20
Mon. Mar 17, 2008		Review correspondence; review status of case.	0.40
Thu. Mar 20, 2008		Short tel. hearing before magistrate judge; review Equifax's dep. notice interrogatories and document requests, served yesterday; e-mail to client.	0.80
Wed. Mar 26, 2008		Review correspondence from Equifax's counsel; internal strategy memo re: several discovery items, e-mail; meeting with JAF.	1.40
Thu. Mar 27, 2008		Prepare portions of responses and objections to Equifax's written discovery requests.	2.30
Tue. Apr 1, 2008		E-mail correspondence with counsel for Equifax.	0.30
Wed. Apr 2, 2008		Review several e-mails; meeting with JAF re: strategy matters and scheduling/travel to Atlanta.	0.60
Mon. Apr 14, 2008		Review correspondence; review deposition schedule; review confidentiality order; review Third Circuit law re: same.	1.80

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Fri. Apr 18, 2008		Review correspondence re: deposition scheduling; review Equifax's answer to interrogatories; begin to review part of 2500 page plus document production.	3.50
Fri. Apr 25, 2008		Review correspondence re: deposition scheduling; review written discovery responses; conference with JAF.	0.60
Mon. Apr 28, 2008		Review select groups of documents produced by Equifax; outline need for follow-up discovery in those areas; review correspondence re: deposition scheduling from L.Perling and internal e-mails, 9 in total;	5.60
Tue. Apr 29, 2008		Continue to review discovery responses; coordination re: depositions; review and revise motion to extend deadlines of factual discovery; file same; e-mail correspondence with opposing counsel and some internal e-mails, 13 in total.	6.20
Wed. Apr 30, 2008		Review and respond to correspondence from Equifax's counsel; review and revise responses to Equifax's interrogatories; review and revise responses to Equifax's document requests; review our document production; review Equifax's document production for select information; meetings with JAF and MJS.	8.40
Thu. May 1, 2008		Review select portions of Equifax's document production to date; continue to prepare and revise Plaintiff's answers to interrogatories and document requests; several meeting with paralegal re:same; calls and e-mail with client; e-mails from L.Perling;finalize and serve Plaintiff's response and objections to Equifax's document requests and Interrogatories.	7.90
Fri. May 2, 2008		E-mail correspondence re: status of case, plaintiff's deposition, written discovery, scheduling and strategy meeting. Correspondence to opposing counsel re: deposition scheduling; prepare package for D.Searles and MJS re: discovery responses and comprehensive strategy memo for case and client prep.	4.80
Fri. May 9, 2008		Review ECF re: order on discovery; review correspondence from JAF; correspondence to/from L.Perling; meeting with MJS, internal e-mails from same; review correspondence to client; 12 e-mails.	0.90
Mon. May 12, 2008		Correspondence to and from L.Perling.	0.30
Wed. May 14, 2008		Correspondence to and from L.Perling.	0.30
Fri. May 16, 2008		Prepare supplemental responses to Equifax's discovery; additional production of 7 PDF package of docs; review carefully; meeting with paralegal; prepare for production and serve; review Equifax's motion to compel; pull 3 cases cited there in and read them; other select legal research; notes to file re: response;	8.30

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Tue. May 20, 2008		E-mail correspondence with L.Perling re: Atlanta deps; internal e-mails re: strategy matters; meeting MJS.	6.80
Tue. May 27, 2008		Review correspondence; reply to same; work on opposition to motion to compel; review Equifax's written discovery to date and deposition schedule; several e-mails with D.Searles, L.Pearling re: meet and confer topics/discovery disputes.	6.70
Wed. May 28, 2008		Work with MJS in opposition to motion to compel, including review and select discovery, review of several e-mail and review of case law re: waiver and disclosure of other select information in class actions; legal research re: several issues.	6.90
Fri. May 30, 2008		Continue to prepare, review and revise opposition to motion to compel; review correspondence to client.	8.80
Mon. Jun 2, 2008		Prepare letter in response to follow-up discovery disputes (Equifax's letter of May 23); reviewed additional documents; meeting with MJS and paralegal re: client and his dep, additional documents, etc., prepare package of documents for client's dep.; review same; correspondence to client; conduct select legal research re: discovery dispute issues; review select portions of Equifax's document production and select answer to our interrogatories. Notes re: documents produced and documents still needed.	8.30
Tue. Jun 3, 2008		Review Equifax's responses to interrogatories and outline need for select follow-up; continue to review portions of Equifax's document production; e-mail to opposing counsel re: deficiencies and possible motion to compel; prepare several deposition notices, and revised notices; serve same.	6.80
Wed. Jun 4, 2008		Review Plaintiff's supplemental responses and supplemental document production; review with MJS prior to production; review MJS's correspondence to L.Perling; continue to review Equifax's responses to our written discovery and Equifax's document production; notes to file.	5.50
Thu. Jun 5, 2008		Several e-mail re: rescheduling issues with client's dep.; call to client; call to client's wife.	1.10
Mon. Jun 9, 2008		Review e-mail correspondence; meeting with MJS re: client prep.; meet with client; meeting with co-counsel; 7 e-mails re: discovery disputes.	4.40
Wed. Jun 11, 2008		Review correspondence; review file; strategy meeting with MJS; call to client re: his deposition.	1.50
Fri. Jun 13, 2008		E-mail correspondence to L.Perling re: discovery dispute; review and reply to several e-mail re: same; meet with MJS re: same.	0.90

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Mon. Jun 16, 2008		Several e-mails; prepare for and attend via telephone status conference re: settlement with MJ Strawbridge; review written discovery; make plans for Atlanta deps; several e-mails re: same; e-mails re: Plaintiff's dep.; prepare outline for strategy meeting re: 4 issues.	3.90
Tue. Jun 17, 2008		Review select documents in preparation for next week's deposition in Atlanta; call court re: conference with Judge Strawbridge; review and reply to 12 e-mails from opposing counsel and co-counsel; review court order re: oral argument/hearing on motion to compel.	4.90
Wed. Jun 18, 2008		E-mail correspondence from L.Perling re: deposition; internal e-mails re: same; coordination to trip to Atlanta for deps.; gather some documents for deps; search for prior testimony by V.Banks.	3.10
Thu. Jun 19, 2008		Review ECF notice from Judge Strawbridge; correspondence to L.Perling re: upcoming depositions and related discovery issues.	0.60
Fri. Jun 20, 2008		Review written discovery to date and all documents produced, and begin to prepare for several Equifax depositions scheduled for Tues and Wed.	9.50
Mon. Jun 23, 2008		Review and respond to several e-mails by L. Perling; review confidentiality issue/agreement; review additional documents produced by Equifax, prepare for Atlanta deposition; travel to Atlanta	9.40
Tue. Jun 24, 2008		Prepare and take deps. in Atlanta; prep. for next day.	11.80
Wed. Jun 25, 2008		Travel back from Atlanta; outline plan for third party discovery from ChoicePoint; prepare for tomorrow's hearing with Judge Brody re: Equifax's motion to compel.	15.70
Thu. Jun 26, 2008		prepare for and attend motion to compel hearing in chambers; review all briefs previously filed re: that motion; e-mail to L.Perling; e-mail to client.	4.90
Fri. Jun 27, 2008		Several e-mails with L.Perling re: remaining discovery schedule; review status of written discovery; call to client.	1.60
Mon. Jun 30, 2008		Prepare motion to extend deadlines and proposed order; e-mails with opposing counsel re: same; call to client and discussion with MJS re: Plaintiff's deposition and well as supplemental answers to interrogatories; file joint motion.	4.40
Mon. Jul 7, 2008		Review deposition transcripts that came in today (DeGrace, Fluellen, Banks); notes re: same; internal e-mail re: same; review status of Plaintiff's dep scheduling with MJS.	7.10

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Tue. Jul 8, 2008		Prepare supplemental responses to interrogatories; calls with client; review subpoenas to ChoicePoint.	2.90
Wed. Jul 9, 2008		Review and revise written discovery; select legal research before answering interrogatories re: 23(b)(1) and (b)(2) classes.	3.40
Thu. Jul 10, 2008		Work on written discovery (2d Supp. Resp); call to client; independent research re: several issues with other cases; internal e-mails re: same; work on subpoena.	3.60
Fri. Jul 11, 2008		Review and finalize written discovery (2d supp. responses); correspondence re: same; calls to client.	2.60
Mon. Jul 14, 2008		Review status of third party discovery; draft letter for subpoena; select legal research re: out-of-state subpoena service; review renewed dep. notice; review correspondence with our objections; call to client.	2.00
Tue. Jul 15, 2008		E-mails with co-counsel; review material for preparation of client for his deposition; call to client; review status of subpoena to ChoicePoint.	0.40
Thu. Jul 17, 2008		Gather material for client's dep; prepare self for same; call with client.	1.70
Fri. Jul 18, 2008		Prepare client for his deposition and defend same; several e-mail re: dep. and third party discovery; strategy meetings with other attorneys.	12.60
Mon. Jul 21, 2008		E-mail correspondence from L.Perling; e-mail correspondence from client; scheduling of third party depositions.	0.40
Tue. Jul 22, 2008		E-mails correspondence via e-mails (several) to and from with client; e-mail correspondence with opposing counsel and third party re: discovery issues; strategy meeting re: same.	1.80
Wed. Jul 23, 2008		Review letter from defense counsel to court; review related correspondence; call to client; telephone hearing with court; 12 e-mails with Equifax's counsel, ChoicePoint's counsel and co-counsel re: scheduling of Equifax dep.; prepare same and serve.	4.20
Tue. Jul 29, 2008		Begin to prepare motion for class cert.	5.50
Wed. Jul 30, 2008		Continue to work on motion for class certification; select legal research.	4.90
Thu. Jul 31, 2008			9.60

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Prepare for deposition of ChoicePoint; research select issues re: class cert; circulate draft and outline for motion for class cert; select legal research re: other class cert briefing against Equifax.	
Fri. Aug 1, 2008			7.60
		Prepare for (including review of prior deps by the witness) and take deposition of ChoicePoint's A.Klaer; continue to research and work up class brief.	
Mon. Aug 4, 2008			6.20
		Review deposition transcripts; review documents in connection with our motion for class cert; legal research; review and incorporate revisions into class cert. motion per DAS e-mail.	
Tue. Aug 5, 2008			3.10
		Review e-copy of Plaintiff's dep. transcript; notes to file.	
Wed. Aug 6, 2008			0.40
		E-mails from B.Goheen and L.Perling; internal e-mail re: scheduling of briefs.	
Thu. Aug 7, 2008			3.70
		Review several e-mails; review status of motion for class certification; select legal research re: same; draft section.	
Fri. Aug 8, 2008			0.20
		Order resetting deadlines re: class cert. briefing.	
Wed. Aug 13, 2008			7.10
		Correspondence with client; internal correspondence; work on class certification brief; select legal research.	
Thu. Aug 14, 2008			0.20
		Letter from L.Perling re: settlement.	
Fri. Aug 15, 2008			11.40
		Research and write motion for class cert.	
Mon. Aug 18, 2008			6.90
		Finalize and file motion for class certification.	
Tue. Sep 2, 2008			0.40
		Review correspondence accrued when I was away from office; review status of case.	
Wed. Sep 3, 2008			0.40
		Review several e-mails with opposing counsel and among co-counsel.	
Thu. Sep 25, 2008			0.70
		Review joint motion to revise briefing deadlines; e-mail correspondence re: same.	
Wed. Oct 1, 2008			0.40
		Review stip re: deadline; review court order re: same.	
Fri. Oct 3, 2008			3.50
		Review Equifax's response in opposition to our motion for class cert; notes to file.	
Mon. Oct 6, 2008			9.30



Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Review our outline for Reply brief in further support of motion for class cert; review Equifax's response and Exhibits; legal research re: select Rule 23 issues.	
Tue. Oct 14, 2008			8.50
		Research and write my sections of Reply Brief in further support of motion for class cert.	
Wed. Oct 15, 2008			7.70
		Research and write my sections of Reply Brief in further support of motion for class cert.; internal strategy e-mails with co-counsel.	
Fri. Oct 17, 2008			8.80
		Finalize and file Reply Brief in further support of motion for class cert.	
Wed. Oct 22, 2008			1.70
		Review e-mail from D.Searles. Review DOJ brief on FCRA constitutionality.	
Tue. Dec 2, 2008			0.40
		Review letter to Judge Brody.	
Thu. Dec 4, 2008			0.40
		Correspondence to and from client.	
Sat. Jan 31, 2009			0.20
		Correspondence from client.	
Wed. Mar 25, 2009			2.70
		Read court's class cert decision; discuss with JAF; call to client; think about what's next.	
Thu. Apr 9, 2009			4.40
		Review Equifax's 23(f) appeal; think about response;	
Thu. Apr 16, 2009			0.30
		Third Circuit motion re: extra time; review internal e-mails re: same and our response strategy.	
Mon. Apr 20, 2009			9.10
		E-mail correspondence to client; review DAS draft of our response to 23(f) petition; review Equifax's petition for 23(f) review; select legal research; review Judge Brody's class cert decision; notes.	
Wed. Apr 29, 2009			0.60
		Review ECF re: stay; review status of our 3d Cir. response.	
Fri. May 1, 2009			8.80
		Research and writing re: our response to Equifax's 23(f) appeal; internal e-mails re: same.	
Sat. May 2, 2009			10.50
		Research and writing re: our response to Equifax's 23(f) appeal; internal e-mails re: same.	
Mon. May 4, 2009			7.70
		Finalize and file response to Equifax's 23(f) appeal.	
Wed. May 20, 2009			2.20

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Review letter to Judge Brody; review correspondence from D.Searles re: strategy issue; look up Gillespie case and read published decisions in that case.	
Mon. Jun 1, 2009			0.60
		E-mails re: strategy matters.	
Wed. Jun 3, 2009			0.50
		E-mails re: strategy matters.	
Thu. Jun 4, 2009			0.30
		E-mails re: strategy matters.	
Mon. Jun 8, 2009			0.30
		Correspondence from L.Perling; correspondence from D.Searles.	
Tue. Jun 9, 2009			0.90
		Internal discussions and e-mails re: strategy matters relate to dispositive motion and trial; think about case.	
Wed. Jun 10, 2009			1.80
		Prepare proposed discovery plan post-class notice; prepare correspondence to L.Pering re: discovery plan and several outstanding discovery issues.	
Thu. Jun 11, 2009			1.10
		Review and revise proposed class notice and remaining schedule; review memo re: piercing attorney client privilege; e-mails to and from L.Perling.	
Fri. Jun 12, 2009			1.10
		Finalize and file proposed discovery plan and scheduling order for balance of case; calls and e-mails re: same.	
Thu. Jun 18, 2009			2.50
		Review Third Circuit order re: 23(f) appeal; several e-mails re: same; prepare agenda/strategy memo for strategy meeting; coordinate same.	
Fri. Jun 19, 2009			1.10
		Review select documents; review internal memo for strategy meeting with co-counsel; attend same.	
Mon. Jun 22, 2009			0.80
		Correspondence from L.Perling re: meet and confer; review discovery issues that are subject of dispute; notes re: same.	
Thu. Jun 25, 2009			1.50
		Correspondence from L.Perling; review and revise possible stipulation in lieu of deposition; 12 internal e-mails re: strategy on same.	
Mon. Jun 29, 2009			4.20
		Review select deposition transcripts and also trial transcript from Abusaab case; review letter to L. Perling; call with DAS about same and discovery plan; gather information for potential expert report; begin to prepare letter to E.Hendricks.	
Wed. Jul 1, 2009			0.20
		E-mail from L.Perling.	

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Thu. Jul 2, 2009		Correspondence to client; internal correspondence re: class notice; e-mails to and from D.Searles; review Equifax's ECF filing re: objections to class notice; notice re: same; review our proposed class notice.	1.70
Thu. Jul 9, 2009		Correspondence from L.Perling.	0.20
Wed. Jul 15, 2009		Review court notice; discuss possibility of settlement and what may be acceptable; call to client.	0.60
Thu. Jul 16, 2009		Review draft of letter to Perling; think about same; select legal research re: insurance agreements.	0.90
Fri. Jul 17, 2009		Prepare and file motion to compel insurance agreements.	3.90
Mon. Jul 20, 2009		Correspondence re: service on L.Perling.	0.20
Tue. Jul 21, 2009		Review letter and insurance documents produced by Equifax after motion to compel had to be filed.	0.60
Wed. Jul 22, 2009		E-mail to counsel for Equifax re: class list; review internal e-mails re: letter to Perling re: his dep. and preparation for same; legal research re: advice of counsel defense, reasonable "reading" defense, and related issues.	3.90
Fri. Jul 24, 2009		Review proposed letter to Perling with dep. or stip. option; internal e-mails with co-counsel re: same; review court order to show cause; internal memo re: class list.	1.10
Mon. Jul 27, 2009		Review insurance info turned over by Equifax; prepare attend discovery file notice/motion re: withdrawal of motion to compel; review letter and dep. notices for depositions. (2 cases) to L.Perling.	2.90
Tue. Jul 28, 2009		Correspondence with Goheen re: Hendricks dep.; e-mails to Hendricks.	0.30
Mon. Aug 3, 2009		Review internal e-mails and strategy discussions re: Perling dep., expert reports and other discovery matters; call to expert.	0.90
Tue. Aug 4, 2009		Review internal correspondence as to changes to class notice, submission to court re: order to show cause.	1.60
Wed. Aug 5, 2009		Review insurance policies; strategy session re: our settlement posture; prepare for and participate in telephone conference with Judge Strawbridge.	0.60
Fri. Aug 7, 2009			6.30

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Research public record investigation results for other bureaus; meeting with paralegal re additional docs. for expert.; Several internal e-mails among co-counsel and strategy discussion re; deposition of Perling and e-mails from Goheen.; Review response to order to show cause re: changes to class notice; review several e-mails among co-counsel and respond to some.	
Tue. Aug 11, 2009			4.60
		Review expert report of E.Hendricks; call to expert; review select information from file; conduct independent research re: Maine incident; internal correspondence with co-counsel; correspondence to opposing counsel with report and CV.	
Tue. Aug 18, 2009			0.70
		Call with DAS re: strategy matters; call with client; call with expert re: deposition scheduling; correspondence from B.Goheen.	
Wed. Aug 19, 2009			0.50
		E-mail from expert; reply; internal e-mail re: same; meeting with paralegal.	
Fri. Aug 21, 2009			0.20
		Follow up re: expert dep./ e-mail re: same.	
Tue. Aug 25, 2009			0.60
		E-mails re: expert dep.; call to expert.	
Wed. Aug 26, 2009			3.90
		Review letter from opposing counsel with discovery dispute; review our discovery in detail; internal e-mails re: same; review select deposition pages; call to client; several internal e-mails re: third party subpoena and other strategy matters.	
Thu. Aug 27, 2009			0.90
		Internal email correspondence; review Equifax's attempt to obtain affidavit from Polto; review same; call to Polto; call to client.	
Tue. Sep 1, 2009			1.20
		Review court order re: notice and notice in detail; review correspondence from L.Perling re: class list; several internal e-mails re: same.	
Wed. Sep 2, 2009			2.60
		Review court order re: notice: review correspondence re: class list and outstanding discovery issues; legal research re: L.Perling's position re: "confidentiality" of list.	
Thu. Sep 3, 2009			6.70
		Review several e-mails re: class list, discovery disputes, and related matters; call with client; call with defense counsel; review class list; meetings re: strategic matters and internal e-mails re: same; review documents and e-mails from Equifax's attempts to get third party to sign affidavit; review class list; compare to select interrogatory responses; review L.Perling dep. transcript.	
Fri. Sep 4, 2009			0.80
		Several e-mails re: class list, expert dep.; meeting with paralegal re: other lawsuits.	
Thu. Sep 10, 2009			0.60
		Email correspondence from opposing counsel; co-counsel & internal email correspondence	

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Fri. Sep 11, 2009		Reviewing Equifax's supp. filing notice re: certain costs of class notice; internal correspondence.	1.60
Mon. Sep 14, 2009		Internal email correspondence	0.20
Wed. Sep 16, 2009		Reviewing 1 ECF Notification	0.20
Mon. Sep 21, 2009		Internal email correspondence	0.20
Tue. Sep 22, 2009		Email correspondence from opposing counsel; internal email correspondence	0.60
Wed. Sep 23, 2009		Reviewing 1 ECF Notification; internal email correspondence; review and revise on letters to class members;	2.40
Fri. Sep 25, 2009		Internal email correspondence	0.20
Mon. Sep 28, 2009		Research re: contacting class members; internal memo re: same.	1.90
Thu. Oct 1, 2009		Email correspondence from def counsel; internal email correspondence	0.60
Fri. Oct 2, 2009		Internal email correspondence	1.00
Tue. Oct 6, 2009		Internal email correspondence	0.80
Wed. Oct 7, 2009		Correspondence with opposing counsel; internal email correspondence	0.40
Thu. Oct 8, 2009		Correspondence to select class members; place calls to Philadelphia class members; search class list for select data.	3.50
Tue. Oct 13, 2009		Internal email correspondence; review materials re: select class member; review her file and documents; consider as possible witness.	1.20
Thu. Oct 15, 2009		Review detailed court order re: notice to class, including redlined changes; research re: notice administrators/settlement administrators.	2.90
Tue. Oct 27, 2009		Strategy meeting/conference with JAF and DAS; review several e-mails; review court procedures and work on class notice issues.	0.80
Wed. Oct 28, 2009			0.80

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Review EQ motion to modify; review e-mail correspondence from L.Perling; think about scheduling and case.	
Thu. Oct 29, 2009			1.40
		Work on motion to modify scheduling order; conference with Judge Brody; several internal e-mails.	
Tue. Nov 3, 2009			0.70
		Review correspondence from Perling; review previous scheduling order; call to client.	
Wed. Nov 4, 2009			0.50
		Review correspondence from opposing counsel and proposed new scheduling order; prepare internal strategy e-mail re: issues I see with order leading up to dispositive motions and trial.	
Thu. Nov 5, 2009			0.20
		Internal email correspondence	
Mon. Nov 16, 2009			0.60
		Several e-mails re: proposed scheduling order; calls and discussing with JAF re: same.	
Thu. Nov 19, 2009			0.50
		Several e-mails from court and opposing counsel re: scheduling matters; review status of notice to class and summary judgment briefing.	
Mon. Nov 23, 2009			5.10
		Review and reply to several e-mails re: scheduling, motion practice and class notice; research re: administration and costs of notice; 18 e-mails re: scheduling matters and conference with court; review docket entry/proposed scheduling order; correspondence with expert; review expert bills.	
Wed. Nov 25, 2009			0.60
		Review costs of notice; internal e-mail re: same.	
Mon. Nov 30, 2009			0.20
		Review court order.	
Tue. Dec 1, 2009			0.30
		Review latest ECF filing; review next set of deadlines.	
Thu. Dec 3, 2009			0.20
		Review court order.	
Mon. Dec 14, 2009			0.40
		Review correspondence re: class notice.	
Fri. Dec 18, 2009			0.30
		Correspondence re: class notice.	
Mon. Dec 21, 2009			0.90
		Review and revise frequently asked questions from class members.	
Mon. Jan 4, 2010			0.40
		Internal e-mail re: calls from class members; notes re: possible questions.	

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Wed. Jan 6, 2010		Calls with class members; notes; chart.	0.60
Fri. Jan 8, 2010		Calls with class members; chart.	0.60
Mon. Jan 11, 2010		Calls with class members; chart; e-mails.	0.50
Wed. Jan 13, 2010		Calls with class members; chart; e-mails.	0.40
Mon. Jan 25, 2010		Calls with class members; chart; e-mails.	0.70
Sat. Mar 6, 2010		Review Equifax motion for summary judgment; notes for response.	3.30
Tue. Mar 9, 2010		Review select evidence in connection with Equifax's motion for summary judgment; review client's deposition transcript; review transcript of Klaer; outline select issues for opposition brief; review contracts between Equifax and ChoicePoint in detail; review other select documents from file; review correspondence from class member; call to class member;	7.60
Thu. Mar 11, 2010		Legal research re: Equifax's motion for summary judgment; memo to file.	6.00
Fri. Mar 12, 2010		Return several calls from class members; update chart; review select portions of document production in search for information needed for summary judgment response; research re: ChoicePoint cases.	4.60
Fri. Mar 19, 2010		Document review re: motion for summary judgment and possibly trial; legal research re: select furnisher issues.	4.90
Mon. Mar 22, 2010		Review Equifax's brief re: summary judgment; pull and read select cases; review factual records for select facts; prepare internal memo with outline of responsive arguments.	6.60
Tue. Mar 23, 2010		Legal research re: select issues relating to summary judgment; review factual record; call to client; meetings/e-mails with co-counsel; begin to draft select sections of responsive brief.	7.30
Wed. Mar 24, 2010		Work on select parts of our opposition to Equifax's motion for summary judgment, including legal and factual research on select arguments.	8.70
Thu. Mar 25, 2010		Legal research re: several issues in our opposition to Equifax's motion for summary judgment.	4.40
Fri. Mar 26, 2010			3.30

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Continue to research select issue in connection with summary judgment opposition brief; review record for select factual information.	
Tue. Apr 6, 2010			6.40
		Strategy meetings with JAF; review, proof and make final edits to opposition brief to Equifax's MSJ; review exhibits.	
Wed. Apr 7, 2010			0.80
		Correspondence with co-counsel; think about our settlement posture and trial strategy; review court order re: exhibit under seal.	
Thu. Apr 8, 2010			5.80
		Review file in preparation for strategy meeting with co-counsel re: all pretrial and trial matters; meeting over lunch; outline issues and prepare memo re: same.; several e-mails with potential trial counsel; prepare summary of case and trial issues; prepare package of background material, including class cert decisions and select briefing throughout case.	
Fri. Apr 9, 2010			8.90
		Think about case carefully; circulate revised strategy memo re: all pretrial and trial matters; several e-mails to outside counsel; search for select materials needed by Sola; review Judge Brody's pretrial memo procedures and trial procedures; begin to gather and review deposition transcripts and material as to identify potential trial witnesses and trial exhibits; prepare internal correspondence re: possible settlement, including acceptable class-wide settlement structure that would be acceptable.	
Mon. Apr 12, 2010			3.30
		Meeting with paralegal; begin to gather documents to be used potentially as trial exhibits; pro hac application/motion for R. Sola; begin to prepare pretrial memo.	
Tue. Apr 13, 2010			2.50
		Review Equifax manuals; notes; review other documents for possible trial exhibits; research re: potential trial counsel.	
Thu. Apr 15, 2010			4.50
		Prepare pretrial memo; review documents and transcripts of deposition in connection with same and general trial preparation.	
Fri. Apr 16, 2010			6.30
		Prepare pretrial memo; review documents and transcripts of deposition in connection with same and general trial preparation; review several very length Equifax manuals re: same; make notes and mark up; calls with 4 class members.	
Mon. Apr 19, 2010			3.70
		Continue to work on pretrial memo; review deposition transcripts of select witnesses; review e-mail correspondence from opposing counsel re: reply brief extension and settlement; e-mail to client.	
Tue. Apr 20, 2010			7.70
		Continue to work on pretrial memo; strategy meeting re: settlement and all pretrial matters with counsel; work on draft of point for charge, jury verdict form, voir dire; review potential exhibits carefully; think about case.	
Wed. Apr 21, 2010			11.80
		Lengthy call with client; continue to research and write jury charge; continue to prepare pre-trial memo, voir dire and jury verdict form; meeting with JAF; outline other pre-trial obligations.	



Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Thu. Apr 22, 2010		Continue to work on pretrial submissions; review e-mails from opposing counsel re: opt-outs and settlement; e-mails with co-counsel; correspondence with expert.	4.20
Fri. Apr 23, 2010		Continue to prepare pre-trial submissions; conferences with co-counsel re: same; meet with potential trial witness; calls to class members.	3.40
Mon. Apr 26, 2010		R.Sola pro hac papers; several calls with R.Sola re: pretrial submissions; several e-mails re: same; select legal research; review model jury charge; 23 internal e-mails; strategy discussion with JAF; finalize Plaintiff's trial exhibits; test in electronic format; finalize and file R.Sola pro hac application; finalize and file Plaintiff's pre-trial memo; finalize and file Plaintiff's trial brief; finalize and file Plaintiff's proposed points for charge; finalize and file Plaintiff's proposed voir dire; finalize and file Plaintiff's proposed verdict sheet; serve Plaintiff's trial exhibits.	11.40
Tue. Apr 27, 2010		Review Equifax trial exhibits; review electronic form of same to make sure that they are usable at trial; test; prepare strategy memo/update for all co-counsel.	3.30
Wed. Apr 28, 2010		R. Sola pro hac papers; correspondence with R. Sola.	0.40
Thu. Apr 29, 2010		Review correspondence from L.Perling; review information re: opt-outs; return call from class member.	0.80
Sat. May 1, 2010		Review settlement correspondence.	0.20
Sun. May 2, 2010		Select factual and legal research re: sur-reply; review Equifax reply for select information.	3.50
Mon. May 3, 2010		Review and revise our sur-reply; several strategy meeting with JAF; review use of possible Safeco defense at trial; research; review settlement correspondence.	9.30
Tue. May 4, 2010		Correspondence with R.Sola; correspondence with D.Searles; review select information re: other Equifax settlements.	0.60
Wed. May 5, 2010		Prepare outline of motion in limine; prepare and update strategy memo; circulate; call with R.Sola re: several strategy matters.	5.20
Mon. May 10, 2010		Review correspondence re: settlement; discuss with co-counsel; call to client; correspondence with C.Hergenroether re: page and line designations; review Equifax's voir dire; review Equifax's exhibits list; review Equifax's proposed points for charge – mark up; review Equifax's trial brief; review Equifax's pretrial memo; notes to file;	6.60
Tue. May 11, 2010			0.40

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Review correspondence re: letter to Judge Brody; review correspondence re: JAMS mediation.	
Wed. May 12, 2010		Correspondence with L.Perling; correspondence with B.Goheen; call to JAMS; correspondence with R.Sola; correspondence with D.Searles; call with Perling; handle telephone status hearing with Judge Brody re: mediation and deadlines; several follow-up e-mails to co-counsel re: developments; begin to prepare trial notebook; gather select depositions of Fluellen and DeGrace (several cases); review for select admissions.	12.20
Thu. May 13, 2010		Correspondence with client; correspondence with L.Perling; correspondence with B.Goheen; review, finalize and co-file joint motion re: certain pre-trial deadlines; review new court order re: motions in limine; prepare notes re: some motion in limine we will need to file; correspondence with R.Sola; correspondence with JAMS	3.70
Fri. May 14, 2010		Review court order re: scheduling; prepare updated strategy memo and circulate same to co-counsel; correspondence with R.Sola; correspondence with B.Goheen; calls with several class members; notes re: same; review Equifax trial exhibits.	5.50
Mon. May 17, 2010		Review mediation structure internal memos/correspondence; review Judge Brody's trial procedures; conference call among all co-counsel re: 5/14 strategy memo; 17 e-mails among co-counsel regarding strategy matters; review Equifax's trial exhibits carefully; mark up select exhibits for questioning; segregate select exhibits for motion in limine.	6.90
Tue. May 18, 2010		Correspondence with co-counsel re: strategy matters; prepare entire omnibus motion in limine structure (12 motions in limine); correspondence re: JAMS mediation; valuation of case for settlement purposes; compare to Guillespie; review other Equifax class action settlements.	11.10
Wed. May 19, 2010		Correspondence re: JAMS mediation; research and drafting several parts of our omnibus motion in limine; review Equifax manuals for select information; review deposition transcripts from both Chakejian and Summerfield cases for select information.	7.90
Thu. May 20, 2010		Review Guillespie settlement in detail; 12 internal e-mails with co-counsel re: same and other strategy matters; calls re: JAMS mediation coordination; review old mediation memo format acceptable to JAMS; research and drafts several sections of our omnibus motion in limine; review court order re: final pre-trial conference; gather all previous orders re: scheduling of this matter; review Judge Brody's standing orders re: final pre-trial conference and trial; call with client.	11.40
Fri. May 21, 2010			7.90

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Coordinate strategy meeting among all co-counsel; draft latest update for agenda items and strategy matters; draft parts of our motions in limine; coordinate and revise others parts authored by co-counsel of our motion in limine; call with L.Perling of Equifax re: motion in limine issues and other pre-trial matters; research re: FTC consent decree; review material to be submitted to JAMS; review possible outer contours of actions/exclusions of firm affiliation, NACA affiliations, etc; strategy discussions with JAF; calls with select class members.	
Mon. May 24, 2010		Prepare and circulate to co-counsel page and line designations for several witnesses, Klaer, DeGrace, Fluellen; prepare and finalize, and file, our omnibus motion in limine on 12 subject areas; review Equifax's omnibus motion in limine on 8 subject areas; select legal research.	13.70
Tue. May 25, 2010		Correspondence re: possible settlement, JAMS conference; review Equifax's page and line designations for trial; review correspondence from L.Pering re: motion in limine and possible compromises; review Equifax motion in limine.	2.30
Wed. May 26, 2010		Review and revise mediation memo; correspondence with R.Sola; research and write sections in opposition to Equifax's omnibus motion in limine; internal strategy memo for co-counsel; prepare objections to Equifax's page and line designations for Plaintiff; 5 e-mails; review Plaintiff's deposition transcript and mark it up for review by Plaintiff; prepare outline for Plaintiff's direct examination; prepare package or material that Plaintiff must review for trial and "cliff notes" version of same for client.	14.80
Thu. May 27, 2010		E-mail correspondence with client; draft select section of our response to Equifax's omnibus motion in limine; legal research; review of Abusaab trial transcript; e-mail correspondence with co-counsel; review insert by co-counsel; call to expert; correspondence and research re: Equifax's net worth; review JAMS mediation memo; strategy meeting with JAF; memo re: other class members as potential witnesses; review and revise chart re: same; discussion with paralegal; 15 e-mails.	9.90
Fri. May 28, 2010		Drafting select sections of our response to Equifax's omnibus motion in limine; legal research; revise several section drafted by co-counsel; eight e-mails re: preparation for JAMS mediations.	12.10
Mon. May 31, 2010		Drafting, research and final coordination of our response to Equifax's omnibus motion in limine; revise several sections drafted by co-counsel.	3.80
Tue. Jun 1, 2010		E-mail correspondence with client; take lead in coordinating our response to Equifax's omnibus motion in limine; coordinate final proofing and filing with GG; attend JAMS settlement conference; review Equifax's response to our omnibus motion in limine.	11.40
Wed. Jun 2, 2010			14.90

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Prepare trial exhibits for court and opposing counsel; several e-mails with opposing counsel re: trial exhibits; review counter-designations of Klaer dep.; review select portions of Klaer transcript; notes on objections and impeachment designations; review other Klaer transcripts; review rules of evidence and select case law; prepare for final pretrial conference; prepare to argue motion in limine; attend final pretrial conference and argue same; courtroom tour; call with R.Sola following final pretrial conference; strategy discussions with JAF re: trial; prepare trial notebook; outline items that I must handle for trial.	
Thu. Jun 3, 2010			14.40
		Meet with client; strategy meeting with co-counsel; prepare for possible 2d JAMS settlement conference; 31 e-mails re: several pre-trial matters; review possible final pre-trial order; call potential expert; call R.Sola; work on demonstrative exhibits and PowerPoint; work on Fluellen page and line designations; correspondence re: current class size for PA, 3 states or national settlement; strategy meetings with JAF and MDM.	
Fri. Jun 4, 2010			12.40
		General trial preparations, including demonstrative exhibits; Fluellen page and line designations, PowerPoint; correspondence with defense counsel; several e-mails and telephone conferences with co-counsel and paralegals; several items of correspondence re: second JAMS settlement conference; correspondence re: motion in limine transcript; calls to court re: final pretrial order submission; review transcript.	
Sat. Jun 5, 2010			13.60
		Assist in general trial preparation; prepare for JAMS settlement conference; review of all manuals of select cross examination of Equifax witnesses; prepare memo/notes re: same; strategy discussions with JAF; strategy meeting with R.Sola.	
Sun. Jun 6, 2010			4.50
		Assist with trial preparation; legal research re: select legal issues; call with expert; lengthy call with JAF and research re: trial strategy matters.	
Mon. Jun 7, 2010			15.50
		Prepare for and attend 2d session with JAMS re: possible settlement; meetings with R.Sola and JAF re: trial next day; strategy session; assist with preparations, including outline of possible expert testimony.	
Tue. Jun 8, 2010			8.40
		Attend trial; assist with select exhibits; discussions with expert re: court rulings and his possible testimony; discussions re: settlement throughout day with defense counsel and our team; participate in conference at end of day re: settlement.	
Wed. Jun 9, 2010			1.70
		Length strategy call with counsel in Va., L. Bennett; strategy meeting with JAF re: Va. and NJ actions, proper procedures to sever, transfer.	
Thu. Jun 10, 2010			1.70
		E-mail correspondence with R.Sola; review notes re: settlement; pull old cases with motion for preliminary approval of class settlement; review standard; review several e-mails from D.Searles; meeting with JAF and MDM.	

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Fri. Jun 11, 2010		E-mail correspondence with R. Sola re: select records; review and organize several sets of trial exhibits.	1.10
Mon. Jun 14, 2010		Review certain invoices and other costs of suit; review case law re: taxable costs and broader definition of costs under FCRA; review internal strategy memo from JAF re: transfer motions; meet with E. Novak re: settlement agreement.	3.60
Mon. Jun 21, 2010		Review status of settlement agreement and motion for preliminary approval; several revisions; review Guillespie agreement for select information; meeting with E. Novak.	2.70
Wed. Jun 23, 2010		Continue to work on settlement agreement and motion for preliminary approval.	3.60
Thu. Jun 24, 2010		Revise settlement agreement; review and revise related documents, including proposed final judgment, proposed notice, proposed order for preliminary approval of settlement, and proposal/timing for motion, notice, timing, opt-outs and or objectors, and suggested final approval hearing.	3.30
Fri. Jun 25, 2010		E-mails with JAF from Florida re: calls with B. Goheen discussions; continue to work on settlement agreement and related notice and final judgment; e-mail co-counsel.	1.10
Mon. Jun 28, 2010		Review latest draft of settlement agreement and related papers.	1.10
Wed. Jun 30, 2010		Review correspondence form JAFS re: final statement for mediation sessions.	0.20
Thu. Jul 8, 2010		Review e-mail correspondence from court re: status of settlement; discuss with JAF; review reply correspondence and also correspondence from Equifax.	0.30
Mon. Jul 12, 2010		E-mail correspondence with Virginia counsel re: motion to sever and transfer Webb part of case to E.D. Pa.	0.30
Tue. Jul 20, 2010		Review court orders transferring Va and NJ actions; e-mails with co-counsel and Va. counsel.	0.30
Wed. Jul 21, 2010		Review internal correspondence re: issues and delays with final wording of settlement; prepare internal memo/correspondence re: same.	0.60
Wed. Aug 11, 2010		Review latest draft of settlement agreement; notes; review status of motion for preliminary approval;	1.80
Thu. Aug 19, 2010			3.40

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
		Review and revise latest draft of proposed settlement agreement; meeting with EAN and JAF re: motion to consolidate and for preliminary approval; notice; benefit website and related matters.	
Mon. Aug 23, 2010			2.90
		Review several e-mails in connection with class notice, proposed final judgment and motion for preliminary approval. Review most recent draft of same.	
Tue. Aug 24, 2010			1.40
		Continue to review and revise class notice; meetings with and e-mails with co-counsel.	
Wed. Aug 25, 2010			1.80
		Prepare final revision to class notice; meetings with EAN and JAF.	
Fri. Oct 22, 2010			0.40
		Reviewing preliminary approval order; correspondence to co-counsel.	
Wed. Nov 17, 2010			0.80
		Meeting with JAF and MDM re: notice, call volume form class, training for our paralegals, etc.	
Tue. Nov 23, 2010			0.50
		Review correspondence re: class list; spot check class list to confirm existence of select dames that should be in class.	
Fri. Dec 3, 2010			0.50
		Review Equifax's proposed changes to notice; meet with JAF; review correspondence objection to changes.	
Thu. Dec 16, 2010			0.60
		Confer in firm re: notice to class members and how to answer common concerns for calls that are expected.	
Mon. Dec 20, 2010			0.30
		Review infirm correspondence re: procedures for handling calls of class members with questions; review correspondence from L.Perling re: calls to administrator.	
Tue. Dec 21, 2010			0.20
		Review correspondence to court re: notice.	
Thu. Dec 23, 2010			1.40
		Review confirmatory discovery responses by Equifax; internal notes re: same; confer with EAN; review and revise guidance memo re: calls form class members.	
Thu. Dec 23, 2010			0.60
		Review correspondence from L.Perling; review script that the CA will be using for its automated phone line.	
Thu. Dec 30, 2010			0.60
		Review and reply to correspondence from Chakejian class members with questions.	
Mon. Jan 3, 2011			1.10
		Review and reply to e-mails from several class members.	
Tue. Jan 4, 2011			0.40
		Respond to e-mails from class members.	

Date	Task/Activity Code	Task/Activity Description	Time (hrs)
Mon. Jan 10, 2011		Review notice of objection; confer with co-counsel re: same.	0.50
Fri. Feb 25, 2011		Correspondence and preparation of motion for final approval and fee petition.	1.20
Wed. Mar 16, 2011		Review expert reports; select revisions to motions for final approval and reimbursement of attorney's fees and expenses.	1.70

Total Time:

951.70 Hrs